

I am concerned about the linguistic influence that VRS has already and will continue to have on American Sign Language (ASL), the natural language of Deaf people. There is no cost category (forgive me if my terminology is incorrect) available use when attempting to mitigate this problem, and so no VRS provider (to my knowledge) is addressing this concern.

In the 1930's when radios were just becoming household items, people could travel from one region of the United States to another and barely understand the speech of others they visited, because the accents and regional vocabulary varied so greatly. There are many documented examples, but my own anecdotal one is that my grandmother (now 86) moved to Kentucky from Colorado when she was only 16 after marrying my grandfather. She tells us of how it took her the better part of two years to understand the way people spoke, because their accent was so different from hers.

American English has approached a more standard form and was forever altered in its use and pronunciation because of what the average American heard on radio and later television. The newscasters and radio personalities often took speech training to make sure that their speech patterns were worthy of emulation. They were, by and large, native speakers of English, as it was well known at that time that the preferred "accent" was that of Midwesterners because it was most easily understood by a cross-section of listeners, a tradition that still holds today.

Radio was the first tool of mass media in which some Americans heard English spoken in a different way from that which they were accustomed. Now enters the video relay revolution.

ASL has been, by accounts of linguists, a highly regionalized language since the time it was studied formally. There are one or two places that Deaf people saw different forms and vocabulary in ASL than they saw in thier home areas. This was either at Gallaudet University or NTID. Some people even say that a separate "accent---the Gallaudet accent" exists because of the change in ASL when Deaf people saw or had exposure to the regional accents and dialects while attending college there.

Now, finally, after many years, ASL has a medium of expression that includes exposure to Deaf people who have NEVER seen a regional sign from another area and didn't even know that they were using a highly regionalized dialect. This medium is the video relay service.

But here is is my concern: Deaf people are receiving this feedback from, for the most part, non-native users of the language. Interpreters (and I can say this freely because I am one) would naturally give feedback and interrupting patterns of language use among Deaf ASL users when they have to ask about sign choices, even if that feedback is very subtle. That, in and of itself, is not a bad thing because, after all, the goal is to complete a call successfully. However, the Deaf caller now understands that they used a sign that the interpreter did not understand and likely will try a different sign next time. How many signs (the rich vocabularly of ASL) will be lost because of

this process?

This is a small example, but you can understand the ramifications. ASL will begin to approach a more standardized form and be forever altered in its use and production because of this medium. But who will be presenting the standardized form? Not native users who are practiced in presenting a model worthy of emulation like radio announcers of old, but rather interpreters, who may or may not be presenting a model that is consistent even with community standards among ASL users who have had little or no exposure to regionalized signs.

To my knowledge, none of the VRS companies employs Deaf language consultants or Deaf interpreters nor are they funded to do so. It is particularly tragic that Deaf interpreters are not utilized, as their professional expertise is essential when interpreting for emerging language users, those with cognitive disabilities, and Deaf immigrants, among others. Without Deaf interpreters, these individuals (who likely represent the group that is most benefited by being able to use a visual language as opposed to using text relay because of the English barrier for them) cannot receive effective interpretation.

To that end:

- All VRS companies should employ one or more Deaf language consultants who trains interpreters individually and on a national level. These consultants or employees need to train video CA's regarding the aspects necessary to avoid altering ASL, how to elicit the necessary information to complete the call without inadvertently giving language feedback, recognition of regional signs and dialects, etc.

- Every relay center should employ Deaf interpreters—this is non-negotiable. This will ensure access for those Deaf people who cannot understand ASL as it is presented by hearing video call assistants. These Deaf individuals must have their calls presented in a language mode that is accessible and successful for them.

I understand that current TRS regulations have to be altered to accomplish this. These issues must be addressed or the FCC will have the distinction of being the entity that unwittingly altered one of the only pure language forms left in the United States. The current TRS rules are geared towards the equipment and technology needed to complete TRS calls. Interpreters (even when called video call assistants, we are still interpreters by definition) are not phone equipment, and the rules must be changed.

I want to state that I am not employed by a VRS company and don't run a relay center.